March 5, 2002

Mr. Thomas H. Stinson
Carpenter Co.
P.O. Box 2386
Elkhart, Indiana 46515

Re: **039-15274**
First Administrative Amendment to
Part 70 No.: **T 039-6059-00086**

Dear Mr. Stinson:

Carpenter Co. was issued First Significant Permit Modification (039-14225-00086) on August 14, 2001, to convert the blowing agent of foam pouring line (EU-01A/B) from methylene chloride to carbon dioxide. A letter requesting changes to this modification was received on January 28, 2002. Pursuant to the provisions of 326 IAC 2-7-11(a)(8), an administrative amendment to this permit is hereby approved as described below.

Carpenter Co. has submitted the following comments, requesting changes to the permit modification. Following each comment is a response that addresses the issue and any changes to the permit that are necessary. Deletion of language appear as ~~strikeouts~~ and new language in **bold**:

1. Comment 1:

Since the modification was issued in August, 2001 and the final version of the permit supported by the TSD addendum required reporting of methylene chloride usage through September 30, 2001, the requirements and reporting form associated with the use of methylene chloride should be removed.

Response 1:

The conversion of methylene chloride to carbon dioxide only applied to foam pouring line EU-01A/B with the use of methylene chloride being allowed until September 30, 2001.

The section of the permit that pertains to foam pouring line EU-01A/B is Section D.1. Since methylene chloride is no longer allowed to be used, all unnecessary requirements and forms shall be removed. The conditions of Section D.1 pertain to methylene chloride. Thus, Section D.1 shall be removed.

~~D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]~~

~~(a) Through September 30, 2001, the amount of methylene chloride (MC), with a maximum of 1.5% of propylene oxide, shall be limited to less than 1600 tons per twelve (12) consecutive month period. This limitation will prevent the VOC emissions from the foam pouring line from being greater than 25 tons per year. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.~~

~~(b) Effective October 1, 2001, or upon discontinuation of the use of methylene chloride, whichever is earlier, any change or modification which may increase the potential VOC emissions to 25 tons per year from the processes noted above, must be approved by the Office of Air Quality (OAQ) before such change may occur.~~

(c) On or before October 1, 2001, the Permittee shall discontinue the use of methylene chloride as a blowing agent.

Compliance Determination Requirements

D.1.2 VOC Emissions

Through September 30, 2001, compliance with Condition D.1.1(a) shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.1.3 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits through September 30, 2001, and the VOC emission limits established in Condition D.1.1.

(1) The amount and VOC content of each material used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(2) The cleanup solvent usage for each month;

(3) The total VOC usage for each month; and

(4) The weight of VOCs emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1(a) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The last quarterly summary shall contain information for the period ending September 30, 2001.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Carpenter Co.
Source Address: 195 County Road 15 South, Elkhart, Indiana 46516
Mailing Address: P.O. Box 2386, Elkhart, Indiana 46515
Part 70 Permit No.: T 039-6059-00086
Facilities: Foam Pouring Line, identified as EU-01A/B
Parameter: Methylene Chloride usage
Limit: Less than or equal to 1600 tons per twelve (12) consecutive month period

YEAR: _____

~~Month~~	~~Methylene Chloride used (tons)~~	~~Methylene Chloride used (tons)~~	~~Methylene Chloride used (tons)~~
	~~This Month~~	~~Previous 11 Months~~	~~12 Month Total~~

~~**9** No deviation occurred in this quarter.~~

~~**9** Deviation/s occurred in this quarter.~~
~~Deviation has been reported on:~~

~~Submitted by:~~

~~Title / Position:~~

~~Signature:~~

~~Date:~~

~~Phone:~~

~~Attach a signed certification to complete this report.~~

All other sections shall be renumbered accordingly.

2. Comment 2:

The original draft of the permit included requirements under Section D.10 to report HAP usage on a quarterly basis. We believe these requirements were subsequently deleted from the draft permit as reflected in Comment 2 of the TSD addendum to the Technical Support Document and the final version of the permit. However, the HAP reporting requirements and quarterly report forms were included in the cover letter received with the permit. Please confirm, in writing, that the reporting of HAP usage is not required as per the Addendum to the Technical Support Document.

Response 2:

The issue addressed in the addendum, submitted by Carpenter, requested that the modification be issued with a requirement that the owner or operator notify the OAQ if they do anything to increase the single and combined HAP PTE to greater than 10 and 25 tons per year, respectively.

Carpenter also requested in the addendum, that the related monitoring and reporting requirements in Section D.10 (D.10.1, D.10.3, D.10.4, and D.10.5 and the related reporting forms) be removed.

To address this issue, the Office of Air Quality determined to:

(a) include a requirement that the owner or operator notify the OAQ if they do anything to increase the single and combined HAP PTE to greater than 10 and 25 tons per year, respectively (Condition D.10.1),
(b) include a requirement to determine the HAP emissions (Condition D.10.2),
(c) include a requirement to record the value(s) determined (Condition D.10.3),
(d) include a requirement to keep records of what is being recorded (Condition D.10.4), and
(e) remove unnecessary reporting requirements.

Section D.10 has been renumbered as Section D.9.

Condition D.9.1:

Condition D.9.1 shall be amended as follows to remove all references to methylene chloride:

D.9.1 Hazardous Air Pollutants (HAPs)
~~Effective October 1, 2001, or upon discontinuation of the use of methylene chloride, whichever is earlier, any change or modification which would increase the potential to emit from the entire source of any single HAP to ten (10) tons per year or more, or a combination of HAPs to twenty-five (25) tons per year, respectively, may cause the source to be subject to 40 CFR 63, Subpart III, and shall require prior approval from IDEM, OAQ.~~

The Office of Air Quality has determined that the entire source single and combined HAP potential to emit are less than the applicable levels of 10 and 25 tons per year, respectively.

The owner or operator shall notify the OAQ prior to making any change that would cause the entire source HAP potential to emit to be greater than or equal to 10 tons per year for any single HAP or 25 tons per year for any combination of HAPs.

Condition D.9.2:

A new compliance determination section and an associated condition (D.9.2) shall be added to require the source to determine the HAP emissions that will be used to demonstrate compliance with the 10 and 25 ton per year emission rate limits. Said condition shall be determined on a monthly basis to provide demonstration of compliance on a short term basis.

Compliance Determination

D.9.2 Compliance Determination, Hazardous Air Pollutant (HAP) Emission Rate Limits
To determine compliance with the HAP limits of Condition D.9.1, the owner or operator shall, on a monthly basis, calculate the source single and combined HAP emissions in tons, utilizing information obtained from the applicable material production information and material safety data sheets (MSDS).

~~Compliance with the HAP usage limitations contained in Condition D.10.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the manufacturer.~~

Condition D.9.3:

A new compliance monitoring section and an associated condition (D.9.3) shall be added to require the source to record the HAP emissions required in the Compliance Determination section.

Compliance Monitoring

D.9.3 Compliance Monitoring, Hazardous Air Pollutant (HAP) Emission Rate Limits
The owner or operator shall, on a monthly basis, record the single and combined HAP emissions determined in Condition D.9.2.

Condition D.9.4:

The record keeping requirements of Condition D.9.2 (now Condition D.9.4) shall be revised to be consistent with the new compliance determination and monitoring conditions.

D.9.4 Record Keeping Requirements
To document compliance with the HAP emission limits of Condition D.9.1, the owner or operator shall maintain copies of the single and combined HAP emissions, as required in Condition D.9.3.

All records shall be maintained in accordance with Section C - General Record Keeping Requirements.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Fulton, at (800) 451-6027, press 0 and ask for Scott Fulton or extension (3-5691), or dial (317) 233-5691.

Sincerely,

Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
SDF
cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Tony Pelath and Paul Karkiewicz
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Carpenter Co.
195 County Road 15 South
Elkhart, Indiana 46515

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: 039-6059-00086	Date Issued: June 11, 1999

First Minor Source Modification No. 039-12641-00086	Date Issued: June 16, 2000

First Significant Permit Modification No. 039-14225-00086	Date Issued: August 14, 2001

First Administrative Amendment No. 039-15274-00086	Affected Pages: 2, 3, 4, 31 through 43, with 44, 45, and 49 removed.
Original signed by Paul Dubenetzky Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	March 5, 2002

TABLE OF CONTENTS

D.5 FACILITY CONDITIONS - Closed mold polyurethane foam turnstile EU-5.1, EU5.2

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.5.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]
D.5.2 BACT condition

Compliance Determination Requirements
D.5.3 Testing Requirements [326 IAC 2-7-6(1)]

Record keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
D.5.4 Record Keeping Requirement

D.6 FACILITY OPERATION CONDITIONS - Storage tanks

Record keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
D.6.1 Record Keeping Requirement

D.7 FACILITY OPERATION CONDITIONS - Insignificant boiler

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.7.1 Particulate Matter (PM) [326 IAC 6-2-4]

Compliance Determination Requirements
D.7.2 Testing Requirements [326 IAC 2-7-6(1)]

D.8 FACILITY OPERATION CONDITIONS - Insignificant Degreasing

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.8.1 326 IAC 8-3-2 Cold Cleaner Operations

D.9 FACILITY OPERATION CONDITIONS - Polyurethane foam manufacturing operation

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.9.1 Hazardous Air Pollutants (HAPs)

Compliance Determination Requirements
D.9.2 Compliance Determination, Hazardous Air Pollutant (HAP) Emission Rate Limits

Compliance Monitoring
D.9.3 Compliance Monitoring, Hazardous Air Pollutant (HAP) Emission Rate Limits

Record keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
D.9.4 Record Keeping Requirements

Certification
Emergency/Deviation Occurrence Report
Natural Gas Fired Boiler Certification

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

One (1) laminate line, identified as EU-02A, for water based adhesive lamination of plastic and urethane foam, type of application is roll coating, emissions vented to Stack V32.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Compliance Determination Requirements

D.1.1 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Three (3) adhesive stations with four (4) loop slitting process lines, identified as EU-02B, EU-02B:AOS-No.1 will include the use of UPACO Slabond 523 acetone based adhesive and EU-02B: AOS-No.2 will utilize UPACO 3694, an acetone and heptane based adhesive, coating Polyurethane foam, type of application is HVLP, having general ventilation emissions.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM for each adhesive station shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

One (1) boiler, identified as EU-03, fueled by natural gas, rated at 12.55 MMBtu per hour, exhausting to stack identified as V6.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM)

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating) the PM emissions from the 12.55 MMBtu per hour heat input boiler shall be limited to 0.5 pounds per MMBtu heat input.

This limitation is based on the following equation: $Pt = 1.09/Q^{0.26}$

Where: Pt = Pounds of particulate matter emitted per million Btu heat input.
Q = Total source maximum operating capacity rating in million Btu per hour heat input.

Compliance Determination Requirement

D.3.2 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19]

D.3.3 Natural Gas Certification

The natural gas boiler EU-3 certification form will document compliance with condition D.3.1 when the boiler EU-3 is burning natural gas. The certification form shall be submitted quarterly to the address listed in Section C- General Reporting Requirements of this permit.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

One (1) bonded foam line, identified as EU-04, consisting of the following equipment:

1. grinding operation,
2. pneumatic conveyor system,
3. storage bins,
4. foam dry mixer,
5. wet mixer,
6. molding unit, and
7. storage operations.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM for the bonded foam line shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.4.2 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] :

Two (2) closed mold polyurethane foam turnstile production operation, identified as EU-5.1 and EU-5.2, with total of two (2) robotic high volume low pressure (HVLP) spray application, with maximum capacity of 37.0 lbs. release agent per hour, 808.30 pounds of Isocyanate and 1,550 pounds of polyols per hour, exhausting to stack V-34.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the coating booth shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.5.2 BACT condition

Pursuant to 326 IAC 8-1-6 (New Facilities, General Reduction Requirements),

(a) The high volume low pressure (HVLP) spray application shall be used all the time when two (2) closed mold polyurethane turnstile production units identified as EU-5.1 and EU -5.2 are in operation.

High volume low pressure (HVLP) spray means technology used to apply coating to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(b) The weight percentage solid content and maximum usage of mold release at the two (2) closed polyurethane turnstile production units identified as EU-5.1 and EU-5.2 with a combined maximum capacity of 400 unit per hour shall be no less than 7% and no more than 0.003 gallons per unit. This shall be equivalent or less than 32.50 tons per 12 month period from each turnstile production unit identified as EU-5.1 and EU-5.2.

Any change or modification which may increase the potential VOC emissions from the two (2) closed mold polyurethane turnstile production operation identified as EU-5.1 and EU-5.2 in this BACT analysis shall be approved by the Office of Air Quality (OAQ).

Compliance Determination Requirements

D.5.3 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.4 Record Keeping Requirement

A log of information necessary to document compliance with operation permit condition No. 5.2 (b) shall be maintained. These records shall be kept for at least the past 36 months period and made available upon request to the Office of Air Quality (OAQ).

SECTION D.6 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] : Primary Pour tanks EU-01

Fixed Roof Cone Storage Tanks	Storage Capacity (gallons)	Diameter (feet)	Height (feet)	Vapor MW	Containing	VP (mmHg)	Annual Throughput gallons
P1	12,500	10.5	19.5	3000	POLYOL	0	600,000
P2	12,500	10.5	19.5	3000	POLYOL	0	600,000
P3	12,500	10.5	19.5	3500	POLYOL	0	115,000
P4	12,500	10.5	19.5	3500	POLYOL	0	115,000
P5* CA	12,500	10.5	19.5	174	ISO	0.01	410,000
P6* CA	12,500	10.5	19.5	174	ISO	0.01	410,000
P7* CV	12,500	10.5	19.5	NA	EMPTY	NA	0
P8	4,890	8	15	NA	EMPTY	NA	0
P9	12,500	10.5	19.5	3000	POLYOL	0	130,000
P10	12,500	10.5	19.5	5000	POLYOL	0	115,000
P11	12,500	10.5	19.5	6500	POLYOL	0	150,000
P12	12,500	10.5	19.5	6500	POLYOL	0	150,000
P13	11,500	10.5	18	410	FR	NA	150,000
P14	12,000	10.5	18	NA	EMPTY	NA	0
P15	12,000	10.5	18	NA	EMPTY	NA	0
P16	12,000	10.5	18	NA	EMPTY	NA	0
P17	12,000	10.5	18	5000	POLYOL	0	115,000
P18	12,000	10.5	18	3000	POLYOL	0	130,000
P19	12,000	10.5	18	NA	EMPTY	NA	0
P20	12,000	10.5	18	NA	EMPTY	NA	0
P21* CA	12,000	10.5	18	174	ISO	0	410,000
P22* CA	12,000	10.5	18	174	ISO	0	410,000
P23	12,000	10.5	18	3500	POLYOL	0	115,000
P24	12,000	10.5	18	3500	POLYOL	0	115,000
P25	12,000	10.5	18	3000	POLYOL	0	600,000
P26	12,000	10.5	8	3000	POLYOL	0	600,000
P26A	3,000	8	8	3500	POLYOL	0	100,000

Notes: * Emission control device: conservation vents (CV), Nitrogen Blanket (N2), or Carbon Absorption bed filters (CA)
** Closed system

Facility Description [326 IAC 2-7-5(15)] : Chemical Blending - Tanks

Fixed Roof Cone Storage Tanks	Storage Capacity (gallons)	Diameter (feet)	Height (feet)	Vapor MW	Containing	VP (mmHg)	Annual Throughput gallons
C1	11,500	8	30.5	5000	POLYOL	0	20,000
C2	28,500	12	34	6500	POLYOL	0	250,000
C3	11,500	8	30.5	285	FR	0.2	20,000
C4	11,500	8	30.5	575	EMPTY	NA	0
C5	11,500	8	30.5	575	POLYOL	0	5,000
C6	11,500	8	30.5	575	POLYOL	0	10,000
C7	11,500	8	30.5	575	POLYOL	0	10,000
C8	11,500	8	30.5	700	POLYOL	0	10,000
C9	11,500	8	30.5	5000	POLYOL	0	10,000
C10	11,500	8	30.5	575	POLYOL	0	5,000
C11	28,500	12	34	360	POLYOL	0	150,000
C12	11,500	8	30.5	575	POLYOL	0	5,000
C13**	11,500	8	30.5	116.8	ABA	132.9	50,000
C14	11,500	8	30.5	5000	POLYOL	0	50,000
C15	11,500	8	30.5	5000	POLYOL	0	5,000
C16	11,500	8	30.5	575	POLYOL	0	tanks combined C16 +C17 +
C17	11,500	8	30.5	575	POLYOL	0	C18
C18	11,500	8	30.5	575	POLYOL	0	100,000
C19	28,500	12	34	360	MDI	0	150,000
C20	11,500	8	30.5	NA	EMPTY	NA	Future polyol
C21	11,500	8	30.5	360	MDI	0	20,000
C22	11,500	8	30.5	360	MDI	0	20,000
C23 externally vented	11,500	8	30.5	174	ISO	0.01	30,000
C24	11,500	8	30.5	NA	EMPTY	NA	Future polyol
C25 externally vented	28,500	12	34	500	EXTENDER	0.1	600,000
C26	11,500	8	30.5	5000	POLYOL	0	25,000
C27	11,500	8	30.5	NA	EMPTY	NA	Future polyol
C28	11,500	8	30.5	360	MDI	0	30,000
C29	11,500	8	30.5	538	BPOLYOL	0	10,000
C30	11,500	8	30.5	538	BPOLYOL	0	50,000
C31	11,500	8	30.5	538	BPOLYOL	0	10,000
C32	11,500	8	30.5	538	BPOLYOL	0	10,000
C33	11,500	8	30.5	174	A-PP	0	500,000
C34	11,500	8	30.5	2000	BPOLYOL	0	500,000
C35	11,500	8	30.5	538	BPOLYOL	0	Future polyol
C36	11,500	8	30.5	538	BPOLYOL	0	Future polyol
C37	28,500	12	34	360	MDI	0	150,000
C38**	12,000	9	41	120.8	ABA	0	10,000

Notes: * Emission control device: conservation vent (CV), Nitrogen blanket (N2), or carbon absorption bed filters (CA)
** Closed system

Facility Description [326 IAC 2-7-5(15)] : Rebond tanks EU-4

Fixed Roof Cone Storage Tanks	Storage Capacity (gallons)	Diameter (feet)	Height (feet)	Vapor MW	Containing	VP (mmHg)	Annual Throughput gallons
R1	6,500	8	17.3	174	ISO-PP	0.01	500,000***
R2	4,000	8	10	174	ISO-PP	0.01	500,000***

Notes: * Emission control device, CV, N2, or CA
** Closed System
*** R1 and R2 cascade from one tank to the next for a TOTAL throughput of 500,000 gallons. These tanks are vented through only one (1) vent.

ISO-PP - Isocyanate Prepolymer

Facility Description [326 IAC 2-7-5(15)] : Mold Tanks EU-05

Fixed Roof Cone Storage Tanks	Storage Capacity (gallons)	Diameter (feet)	Height (feet)	Vapor MW	Containing	VP (mmHg)	Annual Throughput gallons
MLD 1	8,200	10	14	195	B POLY	0.01	131,549
MLD2	8,200	10	14	5000	BPOLY	0	323,546
MLD3	8,200	10	14	5000	ISO	0	310,408

Notes: * Emission control device, CV, N2, or CA
** Closed System

Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.6.1 Record keeping Requirement

Pursuant to 60.116b (a) and (b) the owner or operator of each storage vessel shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the vessel for the life of the source.

SECTION D.7 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant:

One (1) boiler, fueled by natural gas, rated at 8.36 MMBtu per hour, exhausting to a stack.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.7.1 Particulate Matter (PM)

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating) the PM emissions from the 8.36 MMBtu per hour heat input boiler shall be limited to 0.6 pounds per MMBtu heat input.

This limitation is based on the following equation: $Pt = 1.09/Q^{0.26}$

Where: Pt = Pounds of particulate matter emitted per million Btu heat input.
Q = Total source maximum operating capacity rating in million Btu per hour heat input.

Compliance Determination Requirement

D.7.2 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.7.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.8 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant:

Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.8.1 326 IAC 8-3-2 Cold Cleaner operations

That pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

(a) equip the cleaner with a cover;

(b) equip the cleaner with a facility for draining cleaned parts;

(c) close the degreaser cover whenever parts are not being handled in the cleaner;

(d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) provide a permanent, conspicuous label summarizing the operation requirements;

(f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a matter that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

SECTION D.9 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Entire Source

The entire source, including, but not limited to, the equipment in the following D Sections:

(a) One (1) foam pouring line, identified as EU-01A/B, consisting of a mixer, tunnel, foam block cut, and slab room, maximum production is 60,000 lbs of foam per hour exhausting through vents 14, 15, 16 and vent b through k.

(b) One (1) laminate line, identified as EU-02A, for water based adhesive lamination of plastic and urethane foam, type of application is roll coating, emissions vented to Stack V32.

(c) Three (3) adhesive stations with four (4) loop slitting process lines, identified as EU-02B, EU-02B:AOS-No.1 will include the use of UPACO Slabond 523 acetone based adhesive and EU-02B: AOS-No.2 will utilize UPACO 3694, an acetone and heptane based adhesive, coating Polyurethane foam, type of application is HVLP, having general ventilation emissions.

(d) One (1) boiler, identified as EU-03, fueled by natural gas, rated at 12.55 MMBtu per hour, exhausting to stack identified as V6.

(e) One (1) bonded foam line, identified as EU-04, consisting of the following equipment:

(1) grinding operation,
(2) pneumatic conveyor system,
(3) storage bins,
(4) foam dry mixer,
(5) wet mixer,
(6) molding unit, and
(7) storage operations.

(f) Two (2) closed mold polyurethane foam turnstile production operation, identified as EU-5.1 and EU-5.2, with total of two (2) robotic high volume low pressure (HVLP) spray application, with maximum capacity of 37.0 lbs. release agent per hour, 808.30 pounds of Isocyanate and 1,550 pounds of polyols per hour, exhausting to stack V-34.

(g) Primary Pour tanks EU-01
Chemical Blending - Tanks
Rebond tanks EU-4
Mold Tanks EU-05

(h) One (1) boiler, fueled by natural gas, rated at 8.36 MMBtu per hour, exhausting to a stack.

(i) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.9.1 Hazardous Air Pollutants (HAPs)

The Office of Air Quality has determined that the entire source single and combined HAP potential to emit are less than the applicable levels of 10 and 25 tons per year, respectively.

The owner or operator shall notify the OAQ prior to making any change that would cause the entire source HAP potential to emit to be greater than or equal to 10 tons per year for any single HAP or 25 tons per year for any combination of HAPs.

Compliance Determination

D.9.2 Compliance Determination, Hazardous Air Pollutant (HAP) Emission Rate Limits

To determine compliance with the HAP limits of Condition D.9.1, the owner or operator shall, on a monthly basis, calculate the source single and combined HAP emissions in tons, utilizing information obtained from the applicable material production information and material safety data sheets (MSDS).

Compliance Monitoring

D.9.3 Compliance Monitoring, Hazardous Air Pollutant (HAP) Emission Rate Limits

The owner or operator shall, on a monthly basis, record the single and combined HAP emissions determined in Condition D.9.2.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19]

D.9.4 Record Keeping Requirements

To document compliance with the HAP emission limits of Condition D.9.1, the owner or operator shall maintain copies of the single and combined HAP emissions, as required in Condition D.9.3.

All records shall be maintained in accordance with Section C - General Record Keeping Requirements.

This page has been removed.

This page has been removed.

This page has been removed.